

REMARKS

*Objections to the Specification: 37 CFR 1.77(b)*

The examiner has objected to the specification for failing to conform with 37 CFR 1.77(b).

The applicants have amended the specification to overcome the objection. No new matter has been added.

*Claim Rejections: 35 USC § 103*

Claims 1-68 are pending in this application. Claims 1, 19, 34, 39, 44, 48, 61 and 65 are independent.

The applicants have amended independent claims 1, 19, 39, 44, 61 and 65 to more clearly indicate that the process, method, product, processor and memory of the claims rely on a search engine. No new matter has been added.

The applicants have also amended dependent claim 10 to correct for a typographical error. "Process" should be "provider," as indicated in similar dependent claims 27 and 41. No new matter has been added.

The applicants have canceled claim 34 and its dependents, claims 35-38.

The examiner has rejected claims 1-68 under 35 U.S.C. 103(a) as being unpatentable over Angles et al. (U.S. Patent 6,385,592) in view of Sheth et al. (U.S. Patent 6,311,194). The applicants disagree with the examiner's rejections.

Angles does not teach "a query monitoring process for monitoring queries entered into a search engine," as featured in claim 1. Instead, Angles defines a Common Gateway Interface as an interface that "specifies how a Web server...launches and interacts with external programs (such as a database search engine) in response to requests from clients (col. 6, lines7-10)." Such

launching and interacting does not obviate the applicant's claim, which represents the notion that "by monitoring the specific areas of interest of a particular user (or visitor) of a search engine, that user's particular areas of interest can be determined and, therefore, advertisements can be targeted to that particular user so that they reflect their particular area of interest (page 9, lines 26-29)." Similarly, Sheth does not teach "a query association process for associating each said monitored query with one or more predefined advertisement categories," also featured in claim 1. Furthermore, Angles does not describe "a preference file maintenance process" that "generat[es] a list of user-preferred advertisement categories." Angles discusses an "advertising module [that] then uses the consumer profile to select an appropriate advertisement (col. 15, lines 34-36, col. 20)" and an "advertising module [that] processes the consumer preferences to determine the appropriate...advertisement (col. 20, lines 63-65)," but he never teaches a process that "generat[es] a list of user-preferred advertisement categories," such as the feature of claim 1. Similarly, Sheth defines "Blended Semantic Browsing and Querying" as "a method of combining browsing and querying to specify search for information (col. 6, lines 53-55)." This combination of browsing and querying, however, does not obviate the query association process, "which processes these queries...so that the entire query (or discrete portions of the query) can be associated with one of several predefined advertisement categories (page 10, lines 11-12)." For at least these reasons, neither Angles nor Sheth obviate the features of claim 1 and, therefore, no combination of the two would have been obvious to a person having ordinary skill in the art. Claim 1 should thus be patentable, claims 2-18, which depend on claim 1, should also be patentable for at least the same reasons.

The arguments for patentability of claim 1 also apply to claims 19, 39, and 44, additional process claims that include the same features as claim 1. In addition to these features, claim 19 also includes "a query storage process for storing said monitored queries in an advertisement preference file." In his definition of CGI, Angles indicates "the on-screen form will invoke a common...CGI 'script' which process the desired database query however (col. 6, lines 13-15)." The examiner implies that the applicants' "query storage process" should be "read on 'database query,'" but Angles is not teaching the storing of queries into a database; he instead describes the

search of a database to answer a query. For at least this reason, claim 19 and its dependents, claims 20-33, should be patentable.

In addition to the features of claim 1, claim 39 also includes "an advertisement repository for storing a plurality of advertisements grouped in accordance with said predefined advertisement categories." Angles teaches "modules that include...an advertisement database (col. 13, lines 62-64)" and an "advertising module...[that] uses the consumer profile to select an appropriate advertisement from the advertisement database (col. 15, lines 34-36)." He does not teach storage of advertisements *grouped* in pre-determined categories, as claim 34 suggests. For at least this reason, claim 39 and its dependents, claims 40-43, should be patentable.

The query association process of claim 44 further includes "a query parsing process for separating said query into one or more discrete chunks." While Sheth describes a process where "a sequence of queries can be performed to determine an advertisement that best matches the user's interest (col. 16, lines 15-17)," a parsing, or separating, of the information in the query into various parts, "which are then associated with predefined advertisement categories (page 19, lines 2-3)," as claim 44 suggests. For at least this reason, claim 44 and its dependents, claims 45-47, should be patentable.

Claim 48 applies to the method for the advertisement targeting process of claim 1. The arguments for the patentability of this claim, along with its dependents, claims 49-60, are at least the same as the arguments made for the patentability of claim 1 and its dependents.

Similarly, claim 61 applies to computer program product used to implement the advertisement targeting process of claim 1. The arguments for patentability of this claim, along with its dependents, claims 62-64, are at least the same as the arguments made for the patentability of claim 1 and its dependents.

Likewise, claim 65 applies to the processor and memory used to perform the advertisement targeting process of claim 1. The arguments for patentability of this claim, along with its dependents, claims 66-68, are at least the same as the arguments made for the patentability of claim 1 and its dependents.

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The fact that the applicants have addressed certain positions of the examiner does not mean that the applicants concede other stated positions of the examiner. The fact that the applicants have made arguments for patentability of claims does not mean that the applicants concede that there are not other good reasons for patentability of those claims or other claims.

Please apply any charges or credits to deposit account 06-1050, reference 10984-600001.

Respectfully submitted,

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